

Case Name: Watson v. City of NY, et al. Case Number: 23-CV-8975 (ldh) (TAM)

<b>CASE MANAGEMENT WORKSHEET</b>			
<u>Preparation for Initial Conference</u>			
Rule 26(f) conference held?	Date: 4/5/2024		
Deadline for Rule 26(a) initial disclosures and any HIPAA-compliant records authorizations:	4/15/2024		
Procedures discussed for producing Electronically Stored Information (ESI)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A
Confidentiality Order to be submitted for Court approval?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
Anticipated number of depositions:	Plaintiff(s): 5-10 Defendant(s): 1-3, each		
First requests for production of documents and for interrogatories due by:	5/14/2024		
<u>Proposed Deadlines for Pre-Settlement Discovery (Phase I)</u>			
Agreed upon completion date for Phase I Discovery: (Reciprocal agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)	11/7		
Date for pre-settlement status conference with counsel: (Proposed date to report the parties' preparedness for mediation or a settlement conference. Presumptively 10-15 days after the completion of Phase I Discovery.)	11/19		
<u>Proposed Deadlines for Discovery and Motion Practice (Phase II)</u>			
Deadline to join new parties or amend pleadings as of right: (Presumptively 15 days after initial settlement conference)	12/3		
All fact discovery completed by: (Presumptively 3.5 months after first requests for documents/interrogatories)	2/4/25		
Joint status report certifying close of fact discovery:	2/11/25		
Anticipated number of expert reports:	Plaintiff(s): 1 Defendant(s): 1		

<b>Exchange of expert disclosures completed by:</b> (Presumptively 30 days after fact discovery)	1/3/25	
<b>Expert depositions completed by:</b> (Presumptively 30 days after initial expert disclosures)	1/21/25	
<b>Exchange of rebuttal expert reports by:</b> (Presumptively 30–45 days after initial expert disclosures)	2/3/25	
<b>All expert discovery completed by:</b>	2/10/25	
<b>CERTIFICATION OF THE COMPLETION OF ALL DISCOVERY BY:</b> (Presumptively 9 months after Initial Conference)	2/11/2025	
<b>Final date to take first step in dispositive motion practice:</b> (Parties are directed to consult the District Judge’s Individual Rules regarding such motion practice. Presumptively 30 days after completion of all discovery.)	3/11/2025	
<b>Do the parties wish to be referred to EDNY’s mediation program pursuant to Local Rule 83.8?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Do the parties consent to trial before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?</b> (The fillable consent form may be found at <a href="https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge">https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge</a> . Consenting does not affect a party’s right to a jury trial.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

SO ORDERED:

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**TARYN A. MERKL**  
United States Magistrate Judge

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**DATE**